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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MITCHELL RYAN JORDAN, an individual,

Plaintiff,

v.

LIBERTY INSURANCE CORPORATION;  
DOE DEFENDANTS 1 THROUGH 5  
inclusive,

Defendants.

Case No. 2:25-cv-00535-GMN-DJA

**STIPULATION TO EXTEND  
DEADLINE TO RESPOND TO  
MOTION TO REMAND**

1 Plaintiff Mitchell Ryan Jordan (“Plaintiff”) and Defendant Liberty Insurance Corporation  
2 (“Defendant”), by and through their attorneys of record, hereby stipulate and agree to extend the  
3 due date for Defendant’s response to Plaintiff’s Motion to Remand (“Motion”). (ECF 7.) The  
4 parties stipulate and agree that the deadline for filing a response to the Motion be extended one  
5 week, to May 6, 2025. This stipulation for extension is not intended for purposes of delay. The  
6 parties hereto respectfully request that a one week extension to respond to the Motion be granted.

7  
8 Dated: April 29, 2025

MAYNARD NEXSEN LLP

9  
10 /s/ Nicholas J. Boos

NICHOLAS J. BOOS

Attorneys for Defendant

LIBERTY INSURANCE CORPORATION

11  
12 Dated: April 29, 2025

THE FELDMAN FIRM, P.C.

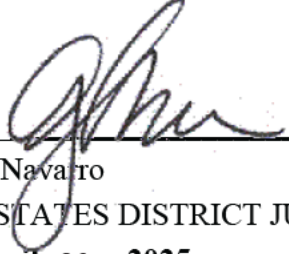
13  
14 /s/ David J. Feldman

DAVID J. FELDMAN

Attorneys for Plaintiff

MITCHELL RYAN JORDAN

15  
16  
17 **IT IS SO ORDERED.**

18  
19  
20   
21 \_\_\_\_\_  
Gloria M. Navarro

UNITED STATES DISTRICT JUDGE

Dated: April 30, 2025.

**PROOF OF SERVICE**

STATE OF CALIFORNIA                     )  
COUNTY OF SAN FRANCISCO            )

I am employed in the County of San Francisco, State of California. I am over the age of 21 and am not a party to the within action. My business address is Maynard Nexsen LLP, Two Embarcadero Center, Suite 1450, San Francisco, California 94111. On the date indicated below, I served the foregoing document described as:

**STIPULATION TO EXTEND DEADLINE TO RESPOND TO MOTION TO REMAND**

on the interested parties in this action by placing: [ ] the original document - OR- [X] a true and correct copy thereof enclosed in sealed envelopes addressed as follows:

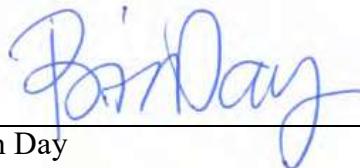
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**[X] BY CM/ECF ELECTRONIC SERVICE:** The following are registered CM/ECF users with the Court and have consented to service through the Court's automatic transmission of a notice of electronic filing.

I declare that I am employed in the office of a member who has been admitted to the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 29, 2025, in San Francisco, California.

  
\_\_\_\_\_  
Brian Day